

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Jonathan J. Maginnis	:	Chapter 13
Debtor	:	
	:	
Bradley J. Puetz D/B/A	:	No. 17-14069 - AMC
Desert Tactical	:	
v.	:	AP No. 17-00311
	:	
Jonathan J. Maginnis D/B/A	:	
ClientMax Marketing	:	

**DEBTORS AMENDED ANSWER TO COMPLAINT TO DETERMINE
DISCHARGEABILITY OF DEBT**

Debtor, Jonathan J. Maginnis D/B/A ClientMax Marketing, by and through his undersigned Counsel, The Law Offices of Anthony A. Frigo, hereby files this Answer to the Complaint to Determine Dischargeability of Debt pursuant to 11 U.S.C. §§ 523(a)(2)(A) and 523(a)(6) and alleges as follows upon information and belief, based upon his investigation of the matter alleged and on documents available as a result of such investigation:

I. JURISDICTION AND VENUE

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. This adversary proceeding arises in connection with the above referenced Chapter 13 Bankruptcy case commenced by filing of a voluntary petition on June 9, 2017 (the "Petition Date").

II. THE PARTIES

5. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

6. Admitted in Part. Denied in Part. It is admitted that John Maginnis is an adult individual who is the Debtor in the bankruptcy case pending in the United States Bankruptcy Court for the Eastern District of Pennsylvania with his principal residence at 118 Yale Avenue, Morton, PA 19070. It is denied that this case was filed under Chapter 7. This Case was filed under Chapter 13 and later converted to a proceeding under Chapter 7.

III. Parties

7. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded.

8. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

9. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

10. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

11. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

12. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

13. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

14. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

15. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

16. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

17. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

18. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

19. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

20. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

21. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded. By way of Further denial the Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

22. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

23. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

24. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded. By way of Further denial the Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

25. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

26. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded.

27. Admitted in part. Denied in part. It is admitted that Debtor filed Bankruptcy. As to the other averment of this paragraph they are Denied as they are conclusions of law to which no response is required. Strict proof is demanded.

28. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

IV. RESERVATION OF RIGHTS AND NO WAIVER

29. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

30. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded.

COUNT I
NON DISCHARGEABILITY OF DEBT
11 U.S.C. §§ 523 (a)(2)(A)

31. Mr. Maginnis incorporates the Proceeding paragraphs by reference as if set forth fully herein at length.

32. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded.

33. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded.

34. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded.

35. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

36. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

37. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

38. Denied. The averments of this paragraph are conclusions of law to which no

response is required. They are, therefore, denied. Strict proof is demanded.

39. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded. By way of Further denial, the documents attached do make any averment regarding "false pretenses, false representations and/or actual fraud."

40. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

41. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

42. Denied. The Debtor(s) is/are without information sufficient to either admit or deny the averments of this paragraph and they are therefore denied. Strict proof is demanded.

43. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded.

COUNT II
NON DISCHARGEABILITY OF DEBT
11 U.S.C. §§ 523 (a)(6)

44. Mr. Maginnis incorporates the Proceeding paragraphs by reference as if set forth fully herein at length.

45. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded.

46. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded.

47. Denied. The averments of this paragraph are conclusions of law to which no response is

required. They are, therefore, denied. Strict proof is demanded.

48. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded.

49. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded.

50. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded.

51. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded.

52. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded.

53. Denied. The averments of this paragraph are conclusions of law to which no response is required. They are, therefore, denied. Strict proof is demanded.

WHEREFORE, Debtor(s), Jonathan J. Maginnis D/B/A ClinentMax Marketing, request that this Honorable Court dismiss the complaint and find the Debt dischargeable and grant such other relief as the Court deems just and appropriate.

Respectfully submitted,

Dated: March 29, 2018

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